

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*Antoinette Sims v. Aurobindo Pharma
USA, Inc., et. al.*

**NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF, ANTOINETTE SIMS**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, filed November 17, 2020 – Document 632), Defendants Aurobindo Pharma USA, Inc. and Aurolife Pharma LLC will take the deposition upon oral examination of Plaintiff, Antoinette Sims, on December 3, 2021 at 10:00 a.m., EDT at Pashman Stein, Court Plaza South, 21 Main Street #200, Hackensack, NJ 07601. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Ethan R. Feldman
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(610) 567-0700
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Date: November 15, 2021

Respectfully submitted,

s/ *Ethan Feldman*

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*Attorney for Defendants
Aurobindo Pharma USA, Inc.,
Aurobindo Pharma Ltd., and
Aurolife Pharma LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of November, 2021, I caused a true and correct copy of the foregoing Notice of Videotaped Deposition of Antoinette Sims to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was served on Plaintiff's counsel by e-mail, with a copy served on all parties via MDL Centrality, on November 15, 2021.

This 15th day of November, 2021.

/s/ Ethan R. Feldman
Ethan R. Feldman